

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

THEODORE MATHIAS,

Defendant.

4:22CR026 JAR/SPM

MOTION FOR PRETRIAL DETENTION AND HEARING

The United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Cassandra J. Wiemken, Assistant United States Attorney for the District, moves the Court to order Defendant detained pending trial and further requests that a detention hearing be held three days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is currently charged with one count of being a felon in possession of a firearm, in violation of Title 18, United States Code, Section 922(g)(1).

2. Pursuant to Title 18, United States Code, Section 3142(g), the weight of the evidence against Defendant, Defendant's history and characteristics, and the nature and seriousness of the danger to any person or the community that would be posed by Defendant's release warrant Defendant's detention pending trial.

3. With regard to the instant offense, Defendant fled from law enforcement officers after they attempted a traffic stop. He sped off, driving recklessly and endangering others. When his vehicle was disabled after being spike stripped, Defendant got into another vehicle

carrying a gun and said, "Drive!" The other driver was terrified. Officers then arrested Defendant and seized his gun.

4. The above circumstances show that Defendant will flee from law enforcement, endangering others while doing so.

5. Defendant's criminal history also demonstrates a danger to the community. Among other convictions, Defendant has a prior federal drug conviction.

6. As such, Defendant is both a danger to the community and a flight risk.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

s/ Cassandra J. Wiemken
CASSANDRA J. WIEMKEN, #91586(KY)
Assistant United States Attorney